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11 Attorney for Plaintiffs DOE JEWISH USC FACULTY
MEMBER 2004 and DOE JEWISH USC STUDENT
12 1987, Individually And On Behalf Of All
Others Similarly Situated

13 UNITED STATES DISTRICT COURT
14
15 CENTRAL DISTRICT OF CALIFORNIA

16 DOE JEWISH USC FACULTY MEMBER
2004, *et al.*,

17 Plaintiffs,

18 v.

19 UNIVERSITY OF SOUTHERN
20 CALIFORNIA, *et al.*,

21 Defendants.
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Case No. 2:24-cv-05712-FLA (SSCx)

**PLAINTIFFS' EX PARTE APPLICATION
FOR AN ORDER TO EXTEND TIME SET
FORTH IN COURT'S MARCH 3, 2025
ORDER GRANTING PLAINTIFFS 14
DAYS LEAVE TO FILE SECOND
AMENDED COMPLAINT UNTIL 14 DAYS
AFTER RESCHEDULED APRIL 3, 2025
SETTLEMENT CONFERENCE [APRIL 17,
2025] AND TO GRANT PLAINTIFFS
LEAVE TO ASSERT A SECTION 1983
FEDERAL CIVIL RIGHTS CLAIM AND
ANY RELATED FEDERAL CLAIMS**

**DECLARATION OF E. JAY GOTFREDON
IN SUPPORT THEREOF**

[PROPOSED] ORDER

**DATE: [NO HEARING]
TIME: [NO HEARING]
CTRM: 6B, Hon. Fernando L. Aenlle-Rocha**

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **YOU ARE HEREBY NOTIFIED THAT** Plaintiffs DOE JEWISH USC FACULTY
3 MEMBER 2004 and DOE JEWISH USC STUDENT 1987, individually and on behalf of all
4 others similarly situated (hereinafter “Plaintiffs”), hereby apply to the Court ex parte for an Order
5 *to extend the time set forth in the Court’s March 3, 2025 Order granting Plaintiffs 14 days*
6 *leave to file a Second Amended Complaint (“SAC”) in this case (the “Order”) an additional 30*
7 *days to April 17, 2025 - 14 days after the rescheduled April 3, 2025 Settlement Conference*
8 *before Honorable Frederick F. Mumm (Ret.), United States Magistrate Judge*, on the following
9 grounds:
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11 1) Plaintiffs and their counsel want to devote as much of their available resources and
12 time to preparing the Putative Class Representatives and their documentary and other evidence
13 for a meaningful settlement conference on April 3, 2025 in the hope that the their concerted
14 efforts will result in a settlement of the entire case and certification of the class for settlement
15 purposes as opposed to spending the same time and resources investigating for and preparing the
16 SAC; and
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18 2) The new Trump Administration’s Department of Justice (“DOJ”) has just announced
19 an investigation into 10 United States universities, including Defendant University of Southern
20 California (“Defendant” or “USC”), for systemic antisemitism and claims of civil and criminal
21 liability pertaining to the same events alleged in Plaintiffs’ Complaint. (See Declaration of E. Jay
22 Gotfredson (“Gotfredson Declaration”) and Exhibit “A” hereto). If the Court grants Plaintiffs’
23 request for additional time, Plaintiffs will also use the added time to notify and communicate with
24 the DOJ about their pending claims and most importantly determine whether the DOJ wants or
25 needs to intervene or stay this action pending the conclusion of its investigation. At a minimum,
26 Plaintiffs and their counsel will use the opportunity and additional time to determine whether any
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1 of the publicly available information generated by the DOJ against USC is material and relevant
2 to Plaintiffs' allegations and in particular, further support the "intent" issues raised by the Court.
3 While responses to Freedom of Information Act ("FOIA") requests may take months, Plaintiffs
4 and their counsel are confident that the DOJ will voluntarily provide Plaintiffs in this case with
5 some additional informal discovery containing corroborating facts and documentary evidence
6 supporting their individual and class claims against USC. Defendant will not suffer any prejudice
7 by the requested delay in that the Order has been pending since August 2024;

8
9 In light of the Court's decisions pertaining to remand of the case and now undisputed
10 federal jurisdiction, Plaintiffs also request that the Court modify the Order to *permit Plaintiffs to*
11 *allege a federal civil rights action under 28 U.S.C. section 1983, as well as any other federal*
12 *claims that may give rise to Defendant's liability.*

13
14 This ex parte application (the "Application") is necessary and appropriate because
15 Defendant's counsel refused Plaintiffs' request for a stipulation affording the same requested
16 relief and extension. (See Gotfredson Declaration).

17 Accordingly, Plaintiffs request that the Court continue Plaintiffs' extant 14-day response
18 time to file a SAC (March 18, 2025) for an additional 30 days to April 17, 2025 (14 days after the
19 rescheduled settlement conference before Judge Mumm). Plaintiffs further request that the Court
20 grant Plaintiffs leave to allege and file additional claims arising under federal law, including a
21 federal civil rights action under Section 1983.
22

23 DATED: March 7, 2025

LAW OFFICES OF MICHAEL E. REZNICK
A Professional Corporation

24
25 By: E. Jay Gotfredson
26 E. Jay Gotfredson

27 Attorney for Plaintiffs DOE JEWISH USC FACULTY
28 MEMBER 2004 and DOE JEWISH USC STUDENT
1987, Individually And On Behalf Of All
Others Similarly Situated

EXHIBIT A

DECLARATION OF E. JAY GOTFREDSON

I, E. JAY GOTFREDSON, declare as follows:

1. I am an attorney licensed to practice law in the State of California and counsel of record for Plaintiffs. Except as otherwise stated, I have personal knowledge of each of the facts stated herein and could and would competently testify thereto.

2. The Complaint in this case has never been amended substantively with respect to any of Plaintiffs' asserted state law claims because the parties were contesting this Court's removal jurisdiction for approximately nine months. Now that jurisdiction has been determined, Plaintiffs request an additional 30 days to file a Second Amended Complaint ("SAC") so that Plaintiffs' legal team can devote our limited time and resources to preparing for the continued settlement conference scheduled for April 3, 2025 – a settlement conference that was voluntarily continued 30 days due to Defendant's counsel's scheduling conflict.

3. While significant additional evidence has come to light since the case was filed in the Los Angeles County Superior Court in May 2024 that further supports Plaintiffs' contentions pertaining to USC's intent and other issues the Court seemed concerned about in its Order - including the public firing of Carol Folt, USC's President, as a direct result of the way she handled the antisemitism and encampments alleged in Plaintiffs' extant pleading during the Spring of 2024 - the Trump Administration's newly instituted Department of Justice ("DOJ") just announced that it is investigating 10 United States universities, *including Defendant USC*, for systemic antisemitism and considering filing claims against USC for criminal and civil liability under the laws of the United States pertaining to the same events alleged in Plaintiffs' Complaint. (Attached hereto as Exhibit "B" is a true and correct copy of an article from the Los Angeles

1 Times announcing the DOJ's investigation). (Plaintiffs respectfully request that the Court take
2 juridical notice of the DOJ's investigation and its stated purpose in further support of the
3 Application).

4 4. If the Court grants Plaintiffs' request for additional time, Plaintiffs and their
5 counsel will devote such time to notifying and communicating with the DOJ about their pending
6 claims, and in discovering any additional available evidence from the DOJ that further supports
7 Plaintiffs' extant claims and any new claims. Plaintiffs can and will also determine whether the
8 DOJ wants or needs to intervene or stay these proceedings. As this Court should recognize, the
9 United States Government does not move as fast as private citizens and it may take several weeks
10 just to track down the responsible DOJ attorneys. Plaintiffs and their counsel can and will use the
11 opportunity and additional time afforded, if any, to determine whether any of the publicly
12 available information generated by the DOJ against USC is material and relevant to Plaintiffs'
13 allegations and in particular the "intent" issues raised by Defendant and the Court. While
14 responses to Freedom of Information Act ("FOIA") requests may take months, I am confident
15 that the DOJ will voluntarily provide Plaintiffs in this case and my team with informal, useful
16 discovery containing additional facts and evidence supporting and corroborating their individual
17 and class claims against USC once we ascertain who the attorneys handling the case are.

18 5. In light of the Court's decisions pertaining to remand of the case and its now
19 undisputed federal jurisdiction under CAFA, Plaintiffs also request that the Court modify the
20 Order to permit Plaintiffs to allege a federal civil rights action under 28 U.S.C. section 1983, as
21 well as any other federal claims that may give rise to Defendant's liability.

22 6. On March 5, 2025, I sought a stipulation from Defendant's counsel for the same relief
23 sought by Plaintiffs' Application, to no avail.

24 I declare under penalty of perjury under the laws of the State of California and United
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1 States of America that the foregoing is true and correct.

2 Executed on March 7, 2025 at Los Angeles, California.

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5 E. Jay Gotfredson
6 E. Jay Gotfredson
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EXHIBIT B



Photographs by GENARO MOLINA Los Angeles Times

n support of the U.S. and Mexico as he joins the rally Saturday in Ontario. President Trump has promised the largest deportation effort in U.S. history.

mass mobilization mass deportation'

t for the Inland Empire's immigrant community,
chers protest Trump administration policies



Euclid Avenue honked in support.

The protest — promoted on social media as a “mass mobilization against mass deportation” — was led by the San Bernardino-based Inland Coalition for Immigrant Justice, which comprises more than 35 organizations serving the immigrant community in the Inland Empire.

The region is home to a sizable immigrant population. According to a 2018 report from UC Riverside's Center for Social Innovation, the Inland Coalition for Immigrant Justice and the California Immigrant Policy Center, 1 in 5 Inland Empire

Antisemitism task force to visit UCLA, USC, others

UC Berkeley is also among California schools the federal group is investigating.

BY JAWEED KALEEM

The U.S. Department of Justice announced Friday that a federal “task force to combat antisemitism” would visit 10 U.S. college campuses as part of investigations into allegations of antisemitic incidents, including three California institutions roiled by pro-Palestinian protests last spring.

The department said the task force, which is looking into “allegations that the schools may have failed to protect Jewish students and faculty members from unlawful discrimination,” would go to UCLA, USC and UC Berkeley.

It did not specify when the visits would take place or which alleged incidents the task force would research. All the campuses have either been part of Department of Education civil rights anti-semitism complaints or have been subject to numerous internal reports of anti-semitism as demonstrations grew after the Oct. 7, 2023, Hamas attack on Israel and Israel's war in Gaza.

In a statement, senior counsel to the assistant attorney general for civil rights and task force leading member Leo Terrill said the group's “mandate is to bring the full force of the federal government to bear in our effort to eradicate anti-semitism, particularly in schools. These visits are just one of many steps this ad-

ministration is taking to deliver on that commitment.”

“The president, Attorney General Pamela Bondi, and the entire administration are committed to ensuring that no one should feel unsafe or unwelcome on campus because of their religion,” Terrell, a civil rights attorney who practices law in Los Angeles, said in a statement.

The announcement said the task force would meet with university leadership, affected students and staff, local law enforcement and community members as it “considers whether remedial action is warranted.”

The Department of Justice did not respond to a request asking for details on the campus visits and the allegations of antisemitism.

Mary Osako, UCLA's vice chancellor for strategic communications, said in a statement that the university “has been and continues to be committed to combating antisemitism and all forms of hate, which have no place on our campus or anywhere.” She added that new UCLA Chancellor Julio Frenk “has a strong track record of combating anti-semitism and is actively at work to help UCLA achieve our goal of fostering an environment where all members of our community are able to live, work, and learn, freely and peacefully.”

In a statement, USC said it has “publicly and unequivocally denounced anti-semitism in all its forms, and has taken strong actions to protect all of our students — including members of our Jewish community — from illegal discrimination of any

[See Antisemitism, B5]

Federal antisemitism task force to visit 10 camp

[Antisemitism, from B1] kind."

"USC is proud to enroll one of the largest Jewish student bodies in the country, and we look forward to speaking with the Department of Justice about everything we have done to create a welcoming and non-discriminatory campus environment for all members of our community."

UC Berkeley spokesman Dan Mogulof said in a statement that the university would "respond to any complaints or allegations through the process prescribed by the DOJ and not through the media. We are confident we have the right processes in place now to respond to any antisemitic incidents."

The other campuses task force members will visit are Columbia, George Washington University, Harvard, Johns Hopkins, New York University, the University of Minnesota, and Northwestern, the statement said. Like the California universities, all have significant Jewish populations and experienced campus strife and allegations of antisemitic incidents as pro-Palestinian campus movements grew.

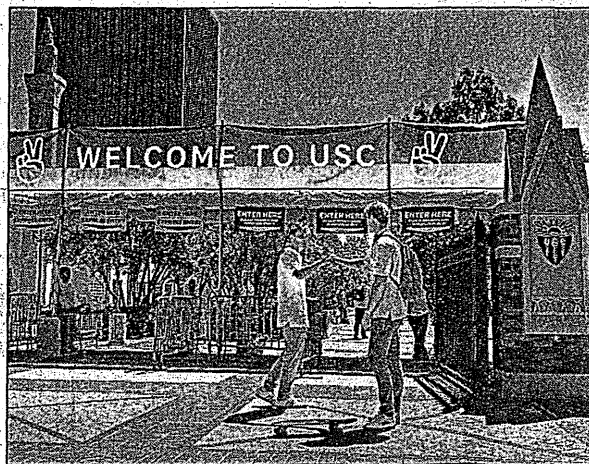
There have also been accusations of anti-Muslim, anti-Arab and anti-Palestinian bias at each campus since 2023, though it is unclear whether there is a federal task force on the matter and no similar campus visits have been announced related to such complaints.

The Department of Justice on Feb. 3 announced a "multi-agency task force to combat antisemitism" and said its "first priority will be to root out antisemitic harassment in schools and on college campuses." At that time the department said it was investigating allegations of antisemitism at UC Berkeley, Columbia, the University of Minnesota, Northwestern and Portland State University. Most of the department's civil rights investigations stem from complaints, but these were undertaken by the department on its own.

The Feb. 3 message said



UCLA'S VICE CHANCELLOR for strategic communications said the university "has been and continues to be a place of antisemitism and all forms of hate, which have no place on our campus or anywhere." The campus was roiled



JASON ARMOND Los Angeles Times

USC SAID IT HAS "publicly and unequivocally denounced antisemitism in all its forms, and has taken strong actions to protect all of our students."

the task force would include representatives from the U.S. Department of Education, U.S. Department of Health and Human Services, and other agencies as it develops. The names of its members were not announced.

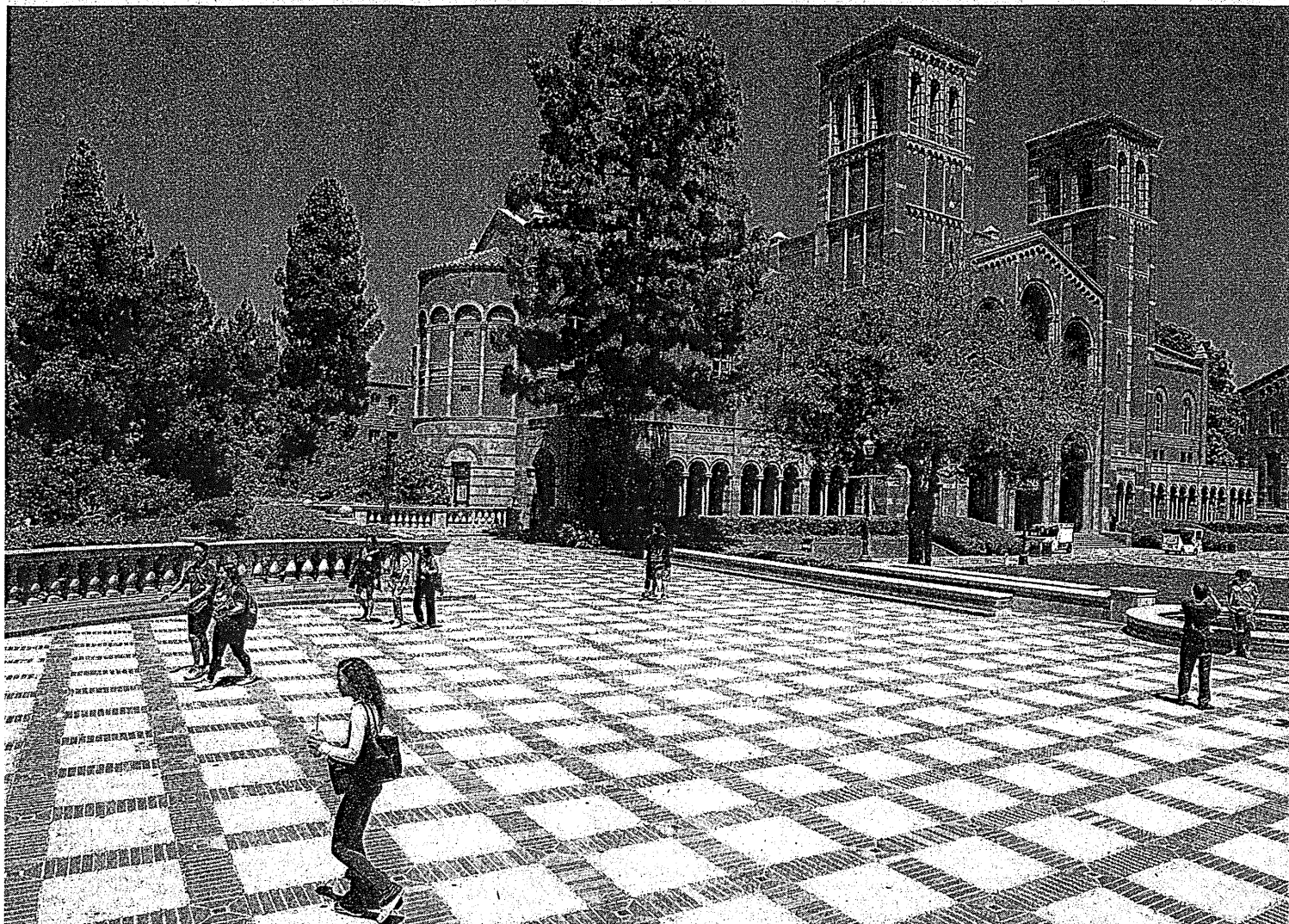
The department formed the task force in response to President Trump's Jan. 29 executive order on combating antisemitism. That order also called on the federal government to "monitor and report activities by alien students and staff" that would potentially qualify them for visa revocation.

It cited federal law that bans noncitizens from being in the U.S. if they support

terrorism. The order did not explicitly equate pro-Palestinian protesters with supporters of Hamas, which the U.S. designates as a terrorist organization.

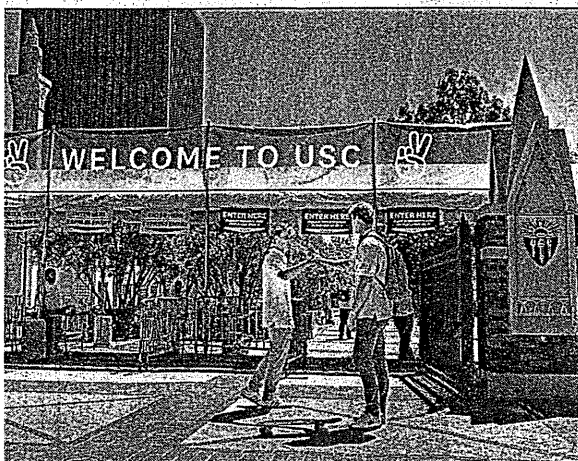
But a fact sheet about the executive order on the White House website, quoting Trump, made clear the president's intentions to "depose Hamas sympathizers and revoke student visas."

Trump and administration officials have broadly described pro-Palestinian protesters as antisemitic and "Hamas sympathizers." Similar accusations have also been made by prominent Jewish organizations including the Anti-Defamation League.



GENARO MOLINA Los Angeles Times

UCLA'S VICE CHANCELLOR for strategic communications said the university "has been and continues to be committed to combating antisemitism and all forms of hate, which have no place on our campus or anywhere." The campus was roiled by protests last spring.



JASON ARMOND Los Angeles Times

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Pro-Palestinian protests at UCLA last year were among the largest in the U.S. Internal and external reviews have faulted leaders for a failure to quickly coordinate a response with L.A. police and other law enforcement when vigilantes attacked the pro-Palestinian encampment on campus on April 30 and May 1.

At USC, dozens of arrests also took place over the spring during pro-Palestinian protests. In addition, the university faced criticism after it pulled a commencement speaker slot for a pro-Palestinian, Muslim valedictorian. The university later canceled its campus-wide commencement entirely.

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2025, I served the following documents by and through the CM/ECF system all parties of record to this action and interested parties who are registered CM/ECF users, or have registered for electronic notice, or have consented in writing to electronic service, and that service will be accomplished through the CM/ECF system:

PLAINTIFFS' EX PARTE APPLICATION FOR AN ORDER TO EXTEND TIME SET FORTH IN COURT'S MARCH 3, 2025 ORDER GRANTING PLAINTIFFS 14 DAYS LEAVE TO FILE SECOND AMENDED COMPLAINT UNTIL 14 DAYS AFTER RESCHEDULED APRIL 3, 2025 SETTLEMENT CONFERENCE [APRIL 17, 2025] AND TO GRANT PLAINTIFFS LEAVE TO ASSERT A SECTION 1983 FEDERAL CIVIL RIGHTS CLAIM AND ANY RELATED FEDERAL CLAIMS

**DECLARATION OF E. JAY GOTFREDSON
IN SUPPORT THEREOF**

[PROPOSED] ORDER

I declare under penalty of perjury under the laws of the State of California and United States of America that the foregoing is true and correct.

Executed on March 7, 2025 at Oak Park, California.

By: /s/E. Jay Gotfredson
E. Jay Gotfredson